

EXHIBIT A

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7 **IN THE UNITED STATES DISTRICT COURT**
8
9 **FOR THE DISTRICT OF ARIZONA**

10 IN RE BARD IVC FILTERS
11 PRODUCTS LIABILITY LITIGATION

12 No. MD-15-02641-PHX-DGC

13 **AMENDED MASTER SHORT FORM**
14 **COMPLAINT FOR DAMAGES FOR**
15 **INDIVIDUAL CLAIMS AND DEMAND**
16 **FOR JURY TRIAL**

17 Plaintiff(s) named below, for their Complaint against Defendants named below,
18 incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc.364).

19 Plaintiff(s) further show the Court as follows:

20 1. Plaintiff/Deceased Party:

21 Tamara Holcomb
22

23 2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of
24 consortium claim:

25 n/a
26

27 3. Other Plaintiff and capacity (i.e., administrator, executor, guardian,
28 conservator):

29 n/a
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2 4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at
3 the time of implant:

4 LouisianaOhio
5 _____

6 5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at
7 the time of injury:

8 MississippiFlorida
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10 6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:
11 _____

12 7. District Court and Division in which venue would be proper absent direct filing:
13 USDC for the District of New Jersey, USDC for the District of
14 MississippiOhio, USDC for the District of LouisianaFlorida

15 8. Defendants (check Defendants against whom Complaint is made):

16 C.R. Bard Inc.

17 Bard Peripheral Vascular, Inc.

18 9. Basis of Jurisdiction:

19 Diversity of Citizenship

20 Other: _____

21 a. Other allegations of jurisdiction and venue not expressed in Master
22 Complaint:

1 _____
2 _____
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4 10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a
5 claim (Check applicable Inferior Vena Cava Filter(s)):

6 Recovery® Vena Cava Filter
7 G2® Vena Cava Filter
8 G2® Express Vena Cava Filter
9 G2® X Vena Cava Filter
10 Eclipse® Vena Cava Filter
11 Meridian® Vena Cava Filter
12 Denali® Vena Cava Filter
13 Other: _____

14 11. Date of Implantation as to each product:

15 September 17, 2014February 26, 2014
16 _____

17 12. Counts in the Master Complaint brought by Plaintiff(s):

18 Count I: Strict Products Liability – Manufacturing Defect
19 Count II: Strict Products Liability – Information Defect (Failure to Warn)
20 Count III: Strict Products Liability – Design Defect
21 Count IV: Negligence - Design
22 Count V: Negligence - Manufacture

1 Count VI: Negligence – Failure to Recall/Retrofit

2 Count VII: Negligence – Failure to Warn

3 Count VIII: Negligent Misrepresentation

4 Count IX: Negligence *Per Se*

5 Count X: Breach of Express Warranty

6 Count XI: Breach of Implied Warranty

7 Count XII: Fraudulent Misrepresentation

8 Count XIII: Fraudulent Concealment

9 Count XIV: Violations of Applicable Mississippi and Louisiana Ohio and
10 Florida Law Prohibiting Consumer Fraud and Unfair and Deceptive
11 Trade Practices

12 Count XV: Loss of Consortium

13 Count XVI: Wrongful Death

14 Count XVII: Survival

15 Punitive Damages

16 Other(s): _____ (please state the facts supporting this
17 Count in the space immediately below)

21 Jury Trial demanded for all issues so triable?

22 Yes

1 □ No
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2 RESPECTFULLY SUBMITTED on this 29²¹_{st}th day of June, 2019.

3 **CURTIS LAW GROUP**

4 By: /s/ William B. Curtis

5 William B. Curtis, *admitted pro hac vice*
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Attorney for Plaintiff

9
10 I hereby certify that on this 22²¹_{st}⁹_{th} day of June, 2019, I electronically transmitted the
11 attached document to the Clerk's Office using the CM/ECF System for filing and transmittal
12 of a Notice of Electronic Filing.

13
14
15 /s/ William B. Curtis

16 William B. Curtis
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